

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,

Plaintiff,

-against-

BLOOMBERG L.P.,

Defendant.

JILL PATRICOT, TANYS LANCASTER,  
and JANET LOURES,

Plaintiffs- Intervenors,

-against-

BLOOMBERG L.P.,

Defendant.

Defendant Bloomberg L.P. (“Bloomberg”), by and through its undersigned counsel, Willkie Farr & Gallagher LLP, hereby answers the complaint (the “Complaint”) of plaintiffs-intervenors Jill Patricot, Tanys Lancaster and Janet Loures (“Plaintiffs-Intervenors”) as follows:

**AS TO ALLEGATIONS CONCERNING THE “NATURE OF THE ACTION”**

1. Bloomberg admits that Plaintiffs-Intervenors purport to bring claims under the statutes cited in Paragraph 1 of the Complaint but deny that Plaintiffs-Intervenors are entitled to relief under any of those statutes.

2. Bloomberg denies the allegations contained in paragraph 2 of the Complaint.

3. Bloomberg denies the allegations contained in paragraph 3 of the Complaint.

4. Bloomberg denies the allegations contained in paragraph 4 of the Complaint.

5. Bloomberg denies the allegations contained in paragraph 5 of the Complaint.

6. Bloomberg denies the allegations contained in paragraph 6 of the Complaint.

7. Bloomberg admits that it is a privately-held company and that its founder, Michael Bloomberg, is the current Mayor of the City of New York. Bloomberg denies the remaining allegation contained in paragraph 7 of the Complaint.

8. Bloomberg denies the allegations contained in paragraph 8 of the Complaint.

9. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegation that, since 2001, Bloomberg has “allegedly” been managed by a “handful of high-level male executives,” because Paragraph 9 does not identify the person(s) by whom the allegation was made,.

10. Bloomberg denies the allegations contained in paragraph 10 of the Complaint.

11. Bloomberg denies the allegations contained in paragraph 11 of the Complaint.

12. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint.

13. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Complaint.

14. Bloomberg denies the allegations contained in paragraph 14 of the Complaint.

15. Bloomberg admits that on August 27, 2006, the New York Post published a piece titled, "Mike gives station an earful." Bloomberg denies the remaining allegations contained in paragraph 15 of the Complaint.

16. Bloomberg denies the allegations contained in paragraph 16 of the Complaint.

17. Bloomberg denies the allegations contained in paragraph 17 of the Complaint.

18. Bloomberg admits that the individual identified in paragraph 18 of the Complaint made the allegations attributed to her therein, but denies that those allegations were true.

19. Bloomberg denies the allegations contained in paragraph 19 of the Complaint.

20. In response to Paragraph 20 of the Complaint, Bloomberg states that Sekiko Garrison's employment with Bloomberg terminated in 1995.

21. Bloomberg denies the allegations contained in paragraph 21 of the Complaint.

22. Bloomberg denies the allegations contained in paragraph 22 of the Complaint.

23. Bloomberg denies the allegations contained in paragraph 23 of the Complaint.

24. Bloomberg denies the allegations contained in paragraph 24 of the Complaint.

25. Bloomberg denies the allegations contained in paragraph 25 of the Complaint.

26. Bloomberg denies the allegations contained in paragraph 26 of the Complaint.

**AS TO ALLEGATIONS CONCERNING "THE PARTIES"**

27. Bloomberg admits that Jill Patricot is a female and a current employee of Bloomberg. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 27 of the Complaint.

28. Bloomberg admits that Tanys Lancaster is a female and a former employee of Bloomberg. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 28 of the Complaint.

29. Bloomberg admits that Janet Loures is a female and a current employee of Bloomberg. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 29 of the Complaint.

30. Bloomberg admits the allegations contained in paragraph 30 of the Complaint.

31. Bloomberg admits the allegations contained in paragraph 31 of the Complaint.

**AS TO ALLEGATIONS CONCERNING “JURISDICTION”**

32. Paragraph 32 sets forth legal conclusions to which, Bloomberg respectfully submits, no response is necessary.

33. Paragraph 33 sets forth legal conclusions to which, Bloomberg respectfully submits, no response is necessary.

34. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of the Complaint.

**AS TO THE ALLEGATIONS CONCERNING “VENUE”**

35. Paragraph 35 sets forth legal conclusions to which, Bloomberg respectfully submits, no response is necessary.

**AS TO THE ALLEGATIONS CONCERNING “PROCEDURAL HISTORY”**

36. Bloomberg admits that, on or around March 24, 2006, Patricot filed a charge of discrimination with the Equal Employment Opportunity Commission (the “EEOC”), but denies the remaining allegations in Paragraph 36 of the Complaint.

37. Bloomberg admits that on or about May 10, 2006, Lancaster filed a charge of discrimination with the EEOC, but denies the remaining allegations in Paragraph 37 of the Complaint.

38. Bloomberg admits that on or about October 27, 2006, Loures filed a charge of discrimination with the EEOC, but denies the remaining allegations in Paragraph 38 of the Complaint.

39. Bloomberg admits the allegations contained in paragraph 39 of the Complaint.

40. Bloomberg admits that the language quoted in paragraph 40 of the Complaint appears in a document sent to Bloomberg by the EEOC on or about June 27, 2007, and refers to that document for its full contents.

41. Bloomberg admits the allegations contained in paragraph 41 of the Complaint, except denies that it engaged in any unlawful practices.

42. Paragraph 42 of the Complaint sets forth a statement of the Plaintiffs-Intervenors intentions to which, Bloomberg respectfully submits, no response is necessary.

**AS TO ALLEGATIONS CONCERNING "JILL  
PATRICOT'S EMPLOYMENT HISTORY AT BLOOMBERG"**

43. Bloomberg denies the allegations contained in paragraph 43 of the Complaint.

44. Bloomberg admits that in or around November 1999, Patricot moved to the United States and subsequently became a Sales Team Leader at Bloomberg. Bloomberg denies the remaining allegations contained in paragraph 44 of the Complaint.

45. Bloomberg admits that in the role of Sales Team Leader, Patricot liaised with Bloomberg customers in New York and New England, including Citigroup and Fidelity. Bloomberg denies the remaining allegations contained in paragraph 45 of the Complaint.

46. Bloomberg admits that as a Sales Team Leader, Patricot had contact with Bloomberg clients, including hedge fund clients in Connecticut. Bloomberg denies the remaining allegations contained in paragraph 46 of the Complaint.

47. Bloomberg admits that in or around April 2004, Patricot's sales team won the "Best Sales Team Award." Bloomberg denies the remaining allegations contained in paragraph 47 of the Complaint.

48. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint.

49. Bloomberg admits the allegations contained in paragraph 49 of the Complaint.

50. Bloomberg denies knowledge or information sufficient to form a belief as to the truth of the allegation contained in the first sentence of paragraph 50 of the Complaint that in November 2004, Patricot was three months pregnant and "just 'beginning to show'". Bloomberg admits the remaining allegations contained in the first sentence of paragraph 50 of the Complaint. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in the second sentence of paragraph 50 of the Complaint.

51. Bloomberg denies the allegations contained in paragraph 51 of the Complaint.

52. Bloomberg denies the allegations contained in paragraph 52 of the Complaint.

53. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in the first sentence of paragraph 53 of the Complaint. Bloomberg denies the allegations contained in the second sentence of paragraph 53 of the Complaint.

54. Bloomberg admits the allegations contained in the first sentence of paragraph 54 of the Complaint. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in the second sentence of paragraph 54 of the Complaint.

55. Bloomberg admits that Patricot did not receive an annual review when she was on maternity leave in May 2005. Bloomberg denies the remaining allegations contained in paragraph 55 of the Complaint.

56. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint.

**As to Allegations that “Ms. Patricot was Discriminated  
Against upon Returning from Maternity Leave in September 2005”**

57. Bloomberg denies the allegations contained in paragraph 57 of the Complaint.

58. Bloomberg denies the allegations contained in paragraph 58 of the Complaint.

59. Bloomberg denies the allegations contained in paragraph 59 of the Complaint.

60. Bloomberg denies the allegations contained in paragraph 60 of the Complaint.



61. Bloomberg denies the allegations contained in paragraph 61 of the Complaint.

62. Bloomberg denies the allegations contained in paragraph 62 of the Complaint.

63. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Complaint.

64. Bloomberg denies the allegations contained in paragraph 64 of the Complaint.

65. Bloomberg denies the allegations contained in paragraph 65 of the Complaint.

66. Bloomberg denies the allegations contained in paragraph 66 of the Complaint.

67. Bloomberg denies the allegations contained in paragraph 67 of the Complaint.

68. Bloomberg denies the allegations contained in paragraph 68 of the Complaint.

69. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint.

70. Bloomberg denies the allegations contained in paragraph 70 of the Complaint.

71. Bloomberg denies the allegations contained in paragraph 71 of the Complaint.

72. Bloomberg denies the allegations contained in paragraph 72 of the Complaint.

73. Bloomberg denies the allegations contained in paragraph 73 of the Complaint.

74. Bloomberg denies the allegations contained in paragraph 74 of the Complaint.

75. Bloomberg denies the allegations contained in paragraph 75 of the Complaint.

76. Bloomberg denies the allegations contained in paragraph 76 of the Complaint.

77. Bloomberg admits the allegations contained in paragraph 77 of the Complaint.

78. Bloomberg denies the allegations contained in paragraph 78 of the Complaint.

79. Bloomberg denies the allegations contained in paragraph 79 of the Complaint.

80. Bloomberg admits the allegations contained in paragraph 80 of the Complaint.

81. Bloomberg admits the allegations contained in the first sentence of paragraph 81 of the Complaint. Bloomberg denies the allegations contained in the second sentence of paragraph 81 of the Complaint.

82. Bloomberg denies the allegations contained in paragraph 82 of the Complaint.

83. Bloomberg denies the allegations contained in paragraph 83 of the Complaint.

84. Bloomberg admits that Ulrik Bjerke became the Head of Global Data for North America in or around May 2006. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 84 of the Complaint.

85. Bloomberg denies the allegations contained in paragraph 85 of the Complaint.

86. Bloomberg denies the allegations contained in paragraph 86 of the Complaint.

87. Bloomberg denies the allegations contained in paragraph 87 of the Complaint.

88. Bloomberg admits that when Patricot returned from her first maternity leave, Mr. Bjerke was a manager directly below Patricot in Bloomberg's organizational scheme. Bloomberg denies the remaining allegations contained in paragraph 88 of the Complaint.

89. Bloomberg denies the allegations contained in paragraph 89 of the Complaint.

90. Bloomberg denies the allegations contained in paragraph 90 of the Complaint.

91. Bloomberg denies the allegations contained in paragraph 91 of the Complaint.

92. Bloomberg denies the allegations contained in paragraph 92 of the Complaint.

93. Bloomberg denies the allegations contained in paragraph 93 of the Complaint.

**As to Allegations that “Bloomberg Has Retaliated Against Ms. Patricot”**

94. Bloomberg admits the allegations contained in paragraph 94 of the Complaint.

95. Bloomberg admits the allegations contained in paragraph 95 of the Complaint.

96. Bloomberg admits the allegations contained in paragraph 96 of the Complaint.

97. Bloomberg denies the allegations contained in paragraph 97 of the Complaint.

98. Bloomberg admits that Patricot was awarded 210 Equity Equivalency Certificates (“Certs”) in May 2004 and 185 Certs in May 2005. Bloomberg denies the remaining allegations contained in paragraph 98 of the Complaint.

99. Bloomberg admits that Patricot was awarded 210 Certs in May 2004, 185 Certs in May 2005 and 140 Certs in May 2006. Bloomberg denies the remaining allegations contained in paragraph 99 of the Complaint.

100. Bloomberg denies the allegations contained in paragraph 100 of the Complaint.

101. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 101 of the Complaint.

102. Bloomberg admits the allegations contained in paragraph 102 of the Complaint.

103. Bloomberg denies the allegations contained in paragraph 103 of the Complaint.

104. Bloomberg denies the allegations contained in paragraph 104 of the Complaint.

**As to Allegations Concerning “Ms. Patricot’s Losses  
Resulting from Bloomberg’s [Alleged] Discrimination and Retaliation”**

105. Bloomberg denies the allegations contained in paragraph 105 of the Complaint.

106. Bloomberg denies the allegations contained in paragraph 106 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
“TANYS LANCASTER’S EMPLOYMENT HISTORY AT BLOOMBERG”**

107. Bloomberg admits the allegations contained in paragraph 107 of the Complaint.

108. Bloomberg admits the allegations contained in paragraph 108 of the Complaint.

109. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 of the Complaint.

110. Bloomberg admits the allegations contained in paragraph 110 of the Complaint.

111. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 of the Complaint.

112. Bloomberg denies the allegations contained in paragraph 112 of the Complaint.

113. Bloomberg admits the allegations contained in paragraph 113 of the Complaint.

114. Bloomberg denies the allegations contained in paragraph 114 of the Complaint.

115. In response to the allegation in Paragraph 115 of the Complaint, Bloomberg admits that Lancaster's duties included travel and conference calls after business hours.

116. Bloomberg admits that Lancaster's salary increased during her tenure at Bloomberg and that in July 2004 her base salary was \$130,000. Bloomberg denies the remaining allegations contained in paragraph 116 of the Complaint.

117. Bloomberg admits that, in August 2004, Lancaster received 425 Certs with an ultimate value of \$285,000 when paid in September 2005. Bloomberg denies the remaining allegations contained in paragraph 117 of the Complaint.

118. Bloomberg denies the allegations contained in paragraph 118 of the Complaint.

**As to Allegations Concerning "Events of August 2004 - October 2005"**

119. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 119 of the Complaint.

120. Bloomberg admits the allegations contained in paragraph 120 of the Complaint.

121. Bloomberg admits the allegations contained in paragraph 121 of the Complaint, except denies that Lancaster was told not to meet with Human Resources.

122. Bloomberg denies the allegations contained in paragraph 122 of the Complaint.

123. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 123 of the Complaint.

124. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 124 of the Complaint.

125. Bloomberg admits that Lancaster received her annual performance review in September 2004, and Bloomberg refers to the written performance evaluation for its contents.

126. Bloomberg admits the allegations contained in paragraph 126 of the Complaint.

127. Bloomberg denies the allegations contained in paragraph 127 of the Complaint.

128. Bloomberg denies the allegations contained in paragraph 128 of the Complaint.

129. Bloomberg denies the allegations contained in paragraph 129 of the Complaint.

130. Bloomberg denies the allegations contained in paragraph 130 of the Complaint.

131. Bloomberg denies the allegations contained in paragraph 131 of the Complaint.

132. Bloomberg denies the allegations contained in paragraph 132 of the Complaint.

133. Bloomberg denies the allegations contained in paragraph 133 of the Complaint.

134. Bloomberg denies the allegations contained in paragraph 134 of the Complaint.

135. Bloomberg denies the allegations contained in paragraph 135 of the Complaint.

136. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 136 of the Complaint.

137. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 137 of the Complaint.

138. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 138 of the Complaint.

139. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 139 of the Complaint.

140. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 140 of the Complaint.

141. Bloomberg admits the allegations contained in paragraph 141 of the Complaint.

142. Bloomberg admits the allegations contained in paragraph 142 of the Complaint.



143. Bloomberg denies the allegations contained in paragraph 143 of the Complaint.

144. Bloomberg admits the allegations contained in paragraph 144 of the Complaint.

145. Bloomberg admits the allegations contained in paragraph 145 of the Complaint.

146. Bloomberg admits the allegations contained in paragraph 146 of the Complaint.

147. Bloomberg admits that Mr. Karmen did not voice any opposition to the arrangement proposed by Lancaster, but denies the remaining allegations contained in paragraph 147 of the Complaint.

148. Bloomberg denies the allegations contained in paragraph 148 of the Complaint.

149. Bloomberg admits the allegations contained in paragraph 149 of the Complaint.

150. Bloomberg admits that in July 2005, Lancaster discussed a potential new role with Pat Eldridge. Bloomberg lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 150 of the Complaint.

151. Bloomberg denies the allegations contained in paragraph 151 of the Complaint.

152. Bloomberg denies the allegations contained in paragraph 152 of the Complaint.

153. Bloomberg admits the allegations contained in paragraph 153 of the Complaint.

154. Bloomberg denies the allegations contained in paragraph 154 of the Complaint.

155. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 155 of the Complaint.

156. Bloomberg denies the allegations contained in paragraph 156 of the Complaint.

157. Bloomberg denies the allegations contained in paragraph 157 of the Complaint.

158. Bloomberg admits that in or around September 2005 Lancaster spoke with a member of Bloomberg's Human Resources department and expressed concern about her career growth and compensation, but denies that Lancaster had been demoted.

159. Bloomberg admits that in or around September 2005, Lancaster alleged that she had not been returned to a "like position" following her maternity leave, but denies that Lancaster's statement was accurate.

160. Bloomberg denies the allegations contained in paragraph 160 of the Complaint.

161. Bloomberg denies the allegations contained in paragraph 161 of the Complaint.

162. Bloomberg denies the allegations contained in paragraph 162 of the Complaint.

163. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 163 of the Complaint concerning Lancaster's state of mind, but denies the remaining allegations contained in paragraph 163 of the Complaint.

164. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 164 of the Complaint.

165. Bloomberg denies the allegations contained in paragraph 165 of the Complaint.

166. Bloomberg admits that Lancaster was awarded 315 Certs in 2004 and 150 Certs in 2005. Bloomberg denies the remaining allegations contained in paragraph 166 of the Complaint.

167. Bloomberg admits the allegations contained in paragraph 167 of the Complaint.

168. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 168 of the Complaint concerning Lancaster's state of mind, but denies that Lancaster suffered discrimination of any sort

169. Bloomberg admits the allegations contained in paragraph 169 of the Complaint.

**As to Allegations Concerning the "Analysis of [Alleged]  
Reduction in Ms. Lancaster's Bloomberg Bonus Certificates"**

170. Bloomberg denies the remaining allegations contained in paragraph 170 of the Complaint.

171. Bloomberg admits the allegations contained in paragraph 170 of the Complaint.

**As to Allegations Concerning “Ms. Lancaster’s Losses  
Resulting from Bloomberg’s [Alleged] Discrimination and Retaliation”**

172. Bloomberg denies the allegations contained in paragraph 172 of the Complaint.

173. Bloomberg denies the allegations contained in paragraph 173 of the Complaint.

**AS TO ALLEGATIONS CONCERNING “JANET  
LOURES’ EMPLOYMENT HISTORY AT BLOOMBERG”**

174. Bloomberg admits that Loures has been employed by Bloomberg since in or around 1989; lacks knowledge or information sufficient to form a belief as to the number of children Loures has; and denies the remaining allegations in Paragraph 174 of the Complaint.

175. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 175 of the Complaint.

176. Bloomberg denies the allegations contained in paragraph 176 of the Complaint.

177. Bloomberg admits the allegations contained in the first sentence of paragraph 177 of the Complaint. Bloomberg denies the remaining allegations in paragraph 177 of the Complaint.

178. Bloomberg denies the allegations contained in paragraph 178 of the Complaint.

179. Bloomberg denies the allegations contained in paragraph 179 of the Complaint.

180. Bloomberg denies the allegations contained in paragraph 180 of the Complaint.

**As to Allegations Concerning “1989 Through September 2005”**

181. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 181 of the Complaint, except Bloomberg admits that Loures has worked for Bloomberg for the majority of her adult life.

182. Bloomberg admits the allegations contained in paragraph 182 of the Complaint.

183. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 of the Complaint.

184. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 of the Complaint.

185. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 of the Complaint.

186. Bloomberg denies the allegations contained in paragraph 186 of the Complaint.

187. Bloomberg denies the allegations contained in paragraph 187 of the Complaint.

188. Bloomberg denies the allegations contained in paragraph 188 of the Complaint.

189. Bloomberg denies the allegations contained in paragraph 189 of the Complaint.

190. Bloomberg denies the allegations contained in paragraph 190 of the Complaint.

191. Bloomberg admits the allegations contained in paragraph 191 of the Complaint.

192. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 192 of the Complaint.

**As to Allegations that “Ms. Loures  
was Discriminated Against After Becoming Pregnant”**

193. Bloomberg admits the allegations contained in paragraph 193 of the Complaint.

194. Bloomberg admits the allegations contained in paragraph 194 of the Complaint.

195. Bloomberg admits the allegations contained in paragraph 195 of the Complaint.

196. Bloomberg admits the allegations contained in paragraph 196 of the Complaint.

197. Bloomberg admits the allegations contained in paragraph 197 of the Complaint.

198. Bloomberg denies the allegations contained in paragraph 198 of the Complaint.

199. Bloomberg denies the allegations contained in the first sentence of paragraph 199 of the Complaint. Bloomberg admits the allegations contained in the second sentence of paragraph 199 of the Complaint.

200. Bloomberg denies the allegations contained in paragraph 200 of the Complaint.

201. Bloomberg admits the allegations contained in paragraph 201 of the Complaint.

202. Bloomberg denies the allegations contained in paragraph 202 of the Complaint.

203. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 of the Complaint.

204. Bloomberg admits the allegations contained in paragraph 204 of the Complaint.

205. Bloomberg admits the allegations contained in paragraph 205 of the Complaint.

206. Bloomberg denies the allegations contained in paragraph 206 of the Complaint.

207. Bloomberg denies the allegations contained in paragraph 207 of the Complaint.

208. Bloomberg denies the allegations contained in paragraph 208 of the Complaint.

209. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 209 of the Complaint.

210. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210 of the Complaint.

211. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211 of the Complaint.

212. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 of the Complaint.

213. Bloomberg admits the allegation as to Loures' statements at the October 2002 meeting. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 213 of the Complaint.

214. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214 of the Complaint.

215. Bloomberg denies that Loures suffered repeated unwarranted demotions but lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 215 of the Complaint.

216. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 of the Complaint.

217. Bloomberg denies the allegations contained in paragraph 217 of the Complaint.

218. Bloomberg denies the allegations contained in paragraph 216 of the Complaint.



**As to Allegations That “Ms. Loures was Discriminated  
Against Following her Second Pregnancy and Maternity Leave”**

219. Bloomberg admits the allegations contained in paragraph 219 of the Complaint.

220. Bloomberg admits that in March 2003 Loures was asked to take over additional management responsibility for the Quality Assurance Department. Bloomberg denies the remaining allegations contained in the first sentence of paragraph 220 of the Complaint. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in the second sentence of paragraph 220 of the Complaint.

221. Bloomberg lacks knowledge or information sufficient to form a belief as to the first sentence in paragraph 221 of the Complaint. Bloomberg denies the remaining allegations in paragraph 221 of the Complaint.

222. Bloomberg admits the allegations contained in paragraph 222 of the .

223. Bloomberg denies the allegations contained in paragraph 223 of the Complaint.

224. Bloomberg denies the allegations contained in paragraph 224 of the Complaint.

225. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225 of the Complaint.

226. Bloomberg admits that Ms. Mazzeo told Loures, in words or substance, not to worry about losing responsibility for Quality Assurance, but denies the remaining allegations contained in paragraph 226 of the Complaint.

227. Bloomberg denies the allegations contained in paragraph 227 of the Complaint.

228. Bloomberg denies the allegations contained in paragraph 228 of the Complaint.

229. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 229 of the Complaint. Bloomberg denies the remaining allegations contained in paragraph 229 of the Complaint.

230. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 of the Complaint.

231. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231 of the Complaint.

232. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 232 of the Complaint.

233. Bloomberg denies the allegations contained in paragraph 233 of the Complaint.

234. Bloomberg denies the allegations contained in paragraph 234 of the Complaint.

235. Bloomberg denies the allegations contained in paragraph 235 of the Complaint.

**As to Allegations Regarding “Ms. Loures’ January 2006 [Alleged] Demotion”**

236. Bloomberg admits the allegations contained in paragraph 236 of the Complaint.

237. Bloomberg admits the allegations contained in paragraph 237 of the Complaint.

238. Bloomberg admits the allegations contained in paragraph 238 of the Complaint.

239. Bloomberg admits the allegations contained in paragraph 239 of the Complaint.

240. In response to paragraph 240 of the Complaint, Bloomberg refers to the Feedback Report for the contents thereof. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 240 of the Complaint.

241. Bloomberg admits that its employees had been instructed to view all criticism as constructive. Bloomberg denies that Loures had never received any negative feedback from Ms. Mazzeo. Bloomberg lacks knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 241 of the Complaint.

242. Bloomberg denies the allegations contained in paragraph 242 of the Complaint.

243. Bloomberg denies the allegations contained in paragraph 243 of the Complaint.

244. Bloomberg lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 244 of the Complaint.

245. Bloomberg admits the allegations contained in paragraph 245 of the Complaint.

246. Bloomberg admits the allegations contained in paragraph 246 of the Complaint.

247. Bloomberg denies the allegations contained in paragraph 247 of the Complaint.

248. Bloomberg denies the allegations contained in paragraph 248 of the Complaint.

249. Bloomberg denies the allegations contained in paragraph 249 of the Complaint.

250. Bloomberg denies the allegations contained in paragraph 250 of the Complaint.

251. Bloomberg denies the allegations contained in paragraph 251 of the Complaint.

252. Bloomberg denies the allegations contained in paragraph 252 of the Complaint.

253. Bloomberg denies the allegations contained in paragraph 253 of the Complaint.

254. Bloomberg denies the allegations contained in paragraph 254 of the Complaint.

255. Bloomberg denies the allegations contained in paragraph 255 of the Complaint.

256. Bloomberg denies the allegations contained in paragraph 256 of the Complaint.

**As to Allegations Concerning the “Juxtaposition of  
Ms. Loures to [Allegedly] Similarly Situated Male Colleagues”**

257. Bloomberg denies the allegations contained in paragraph 257 of the Complaint.

258. Bloomberg denies the allegations contained in paragraph 258 of the Complaint.

259. Bloomberg denies the allegations contained in paragraph 259 of the Complaint.

260. Bloomberg denies the allegations contained in paragraph 260 of the Complaint.

**As to Allegations of “[Alleged] Decreases in Compensation and [Alleged] Retaliation”**

261. Bloomberg admits that Loures was awarded 250 Certs in 2003, 165 Certs in 2004, 135 Cert in 2005, and 100 Certs in 2006. Bloomberg denies the remaining allegations contained in paragraph 261 of the Complaint.

262. Bloomberg denies the allegations contained in paragraph 262 of the Complaint.

263. Bloomberg denies the allegations contained in paragraph 263 of the Complaint.

264. Bloomberg denies the allegations contained in paragraph 264 of the Complaint.

265. Bloomberg denies the allegations contained in paragraph 265 of the Complaint.

266. Bloomberg denies the allegations contained in paragraph 266 of the Complaint.

**As to Allegations Concerning “Ms. Loures’ Losses  
Resulting from Bloomberg’s [Alleged] Discrimination and Retaliation”**

267. Bloomberg denies the allegations contained in paragraph 267 of the Complaint.

268. Bloomberg denies the allegations contained in the first, third and fourth sentences of paragraph 268 of the Complaint. Bloomberg admits the allegations contained in the second sentence of paragraph 268 of the Complaint.

269. Bloomberg denies the allegations contained in paragraph 269 of the Complaint.

**AS TO THE ALLEGATIONS CONCERNING  
A FIRST CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO TITLE VII AND TITLE I**

270. Bloomberg repeats answers to paragraphs “1” through “269” with the same force and effect as if set forth at length herein.

271. Bloomberg denies the allegations contained in paragraph 271 of the Complaint.

272. Bloomberg denies the allegations contained in paragraph 272 of the Complaint.

273. Bloomberg denies the allegations contained in paragraph 273 of the Complaint.

274. Bloomberg denies the allegations contained in paragraph 274 of the Complaint.

275. Bloomberg denies the allegations contained in paragraph 275 of the Complaint.

276. Bloomberg denies the allegations contained in paragraph 276 of the Complaint.

277. Bloomberg denies the allegations contained in paragraph 277 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A SECOND CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO TITLE VII AND TITLE I**

278. Bloomberg repeats answers to paragraphs “1” through “277” with the same force and effect as if set forth at length herein.

279. Bloomberg denies the allegations contained in paragraph 279 of the Complaint.

280. Bloomberg denies the allegations contained in paragraph 280 of the Complaint.

281. Bloomberg denies the allegations contained in paragraph 281 of the Complaint.

282. Bloomberg denies the allegations contained in paragraph 282 of the Complaint.

283. Bloomberg denies the allegations contained in paragraph 283 of the Complaint.

284. Bloomberg denies the allegations contained in paragraph 284 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A THIRD CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO STATE HRL**

285. Bloomberg repeats answers to paragraphs “1” through “284” with the same force and effect as if set forth at length herein.

286. Bloomberg denies the allegations contained in paragraph 286 of the Complaint.

287. Bloomberg denies the allegations contained in paragraph 287 of the Complaint.

288. Bloomberg denies the allegations contained in paragraph 288 of the Complaint.

289. Bloomberg denies the allegations contained in paragraph 289 of the Complaint.

290. Bloomberg denies the allegations contained in paragraph 290 of the Complaint.

291. Bloomberg denies the allegations contained in paragraph 291 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A FOURTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO STATE HRL**

292. Bloomberg repeats answers to paragraphs “1” through “290” with the same force and effect as if set forth at length herein.

293. Bloomberg denies the allegations contained in paragraph 293 of the Complaint.



294. Bloomberg denies the allegations contained in paragraph 294 of the Complaint.

295. Bloomberg denies the allegations contained in paragraph 295 of the Complaint.

296. Bloomberg denies the allegations contained in paragraph 296 of the Complaint.

297. Bloomberg denies the allegations contained in paragraph 297 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A FIFTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO CITY HRL**

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298. Bloomberg repeats answers to paragraphs “1” through “297” with the same force and effect as if set forth at length herein.

299. Bloomberg denies the allegations contained in paragraph 299 of the Complaint.

300. Bloomberg denies the allegations contained in paragraph 300 of the Complaint.

301. Bloomberg denies the allegations contained in paragraph 301 of the Complaint.

302. Bloomberg denies the allegations contained in paragraph 302 of the Complaint.

303. Bloomberg denies the allegations contained in paragraph 303 of the Complaint.

304. Bloomberg denies the allegations contained in paragraph 304 of the Complaint.

305. Bloomberg denies the allegations contained in paragraph 305 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A SIXTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JILL PATRICOT PURSUANT TO CITY HRL**

306. Bloomberg repeats answers to paragraphs “1” through “305” with the same force and effect as if set forth at length herein.

307. Bloomberg denies the allegations contained in paragraph 307 of the Complaint.

308. Bloomberg denies the allegations contained in paragraph 308 of the Complaint.

309. Bloomberg denies the allegations contained in paragraph 309 of the Complaint.

310. Bloomberg denies the allegations contained in paragraph 310 of the Complaint.

311. Bloomberg denies the allegations contained in paragraph 311 of the Complaint.

312. Bloomberg denies the allegations contained in paragraph 312 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A SEVENTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO TITLE VII AND TITLE I**

313. Bloomberg repeats answers to paragraphs “1” through “312” with the same force and effect as if set forth at length herein.

314. Bloomberg denies the allegations contained in paragraph 314 of the Complaint.

315. Bloomberg denies the allegations contained in paragraph 315 of the Complaint.

316. Bloomberg denies the allegations contained in paragraph 316 of the Complaint.

317. Bloomberg denies the allegations contained in paragraph 317 of the Complaint.

318. Bloomberg denies the allegations contained in paragraph 318 of the Complaint.

319. Bloomberg denies the allegations contained in paragraph 319 of the Complaint.

320. Bloomberg denies the allegations contained in paragraph 320 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
AN EIGHTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO TITLE VII AND TITLE I**

321. Bloomberg repeats answers to paragraphs “1” through “320” with the same force and effect as if set forth at length herein.

322. Bloomberg denies the allegations contained in paragraph 322 of the Complaint.

323. Bloomberg denies the allegations contained in paragraph 323 of the Complaint.

324. Bloomberg denies the allegations contained in paragraph 324 of the Complaint.

325. Bloomberg denies the allegations contained in paragraph 325 of the Complaint.

326. Bloomberg denies the allegations contained in paragraph 326 of the Complaint.

327. Bloomberg denies the allegations contained in paragraph 327 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A NINTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO STATE HRL**

328. Bloomberg repeats answers to paragraphs “1” through “327” with the same force and effect as if set forth at length herein.

329. Bloomberg denies the allegations contained in paragraph 329 of the Complaint.

330. Bloomberg denies the allegations contained in paragraph 330 of the Complaint.

331. Bloomberg denies the allegations contained in paragraph 331 of the Complaint.

332. Bloomberg denies the allegations contained in paragraph 332 of the Complaint.

333. Bloomberg denies the allegations contained in paragraph 333 of the Complaint.

334. Bloomberg denies the allegations contained in paragraph 334 of the Complaint.

**AS TO ALLEGATION CONCERNING  
A TENTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO STATE HRL**

335. Bloomberg repeats answers to paragraphs “1” through “334” with the same force and effect as if set forth at length herein.

336. Bloomberg denies the allegations contained in paragraph 336 of the Complaint.

337. Bloomberg denies the allegations contained in paragraph 337 of the Complaint.

338. Bloomberg denies the allegations contained in paragraph 338 of the Complaint.

339. Bloomberg denies the allegations contained in paragraph 339 of the Complaint.

340. Bloomberg denies the allegations contained in paragraph 340 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
AN ELEVENTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO CITY HRL**

341. Bloomberg repeats answers to paragraphs “1” through “340” with the same force and effect as if set forth at length herein.

342. Bloomberg denies the allegations contained in paragraph 342 of the Complaint.

343. Bloomberg denies the allegations contained in paragraph 343 of the Complaint.

344. Bloomberg denies the allegations contained in paragraph 344 of the Complaint.

345. Bloomberg denies the allegations contained in paragraph 345 of the Complaint.

346. Bloomberg denies the allegations contained in paragraph 346 of the Complaint.

347. Bloomberg denies the allegations contained in paragraph 347 of the Complaint.

348. Bloomberg denies the allegations contained in paragraph 348 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A TWELFTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF TANYS LANCASTER PURSUANT TO CITY HRL**

349. Bloomberg repeats answers to paragraphs “1” through “348” with the same force and effect as if set forth at length herein.

350. Bloomberg denies the allegations contained in paragraph 350 of the Complaint.

351. Bloomberg denies the allegations contained in paragraph 351 of the Complaint.

352. Bloomberg denies the allegations contained in paragraph 352 of the Complaint.

353. Bloomberg denies the allegations contained in paragraph 353 of the Complaint.

354. Bloomberg denies the allegations contained in paragraph 354 of the Complaint.

355. Bloomberg denies the allegations contained in paragraph 355 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A THIRTEENTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF JANET LOURES PURSUANT TO TITLE VII AND TITLE I**

356. Bloomberg repeats answers to paragraphs “1” through “355” with the same force and effect as if set forth at length herein.

357. Bloomberg denies the allegations contained in paragraph 357 of the Complaint.

358. Bloomberg denies the allegations contained in paragraph 358 of the Complaint.

359. Bloomberg denies the allegations contained in paragraph 359 of the Complaint.

360. Bloomberg denies the allegations contained in paragraph 360 of the Complaint.

361. Bloomberg denies the allegations contained in paragraph 361 of the Complaint.

362. Bloomberg denies the allegations contained in paragraph 362 of the Complaint.

363. Bloomberg denies the allegations contained in paragraph 363 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A FOURTEENTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JANET LOURES PURSUANT TO TITLE VII AND TITLE I**

364. Bloomberg repeats answers to paragraphs “1” through “363” with the same force and effect as if set forth at length herein.

365. Bloomberg denies the allegations contained in paragraph 365 of the Complaint.

366. Bloomberg denies the allegations contained in paragraph 366 of the Complaint.

367. Bloomberg denies the allegations contained in paragraph 367 of the Complaint.

368. Bloomberg denies the allegations contained in paragraph 368 of the Complaint.

369. Bloomberg denies the allegations contained in paragraph 369 of the Complaint.



370. Bloomberg denies the allegations contained in paragraph 370 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A FIFTEENTH CAUSE OF ACTION FOR GENDER DISCRIMINATION  
ON BEHALF OF JANET LOURES PURSUANT TO STATE HRL**

371. Bloomberg repeats answers to paragraphs “1” through “370” with the same force and effect as if set forth at length herein.

372. Bloomberg denies the allegations contained in paragraph 372 of the Complaint.

373. Bloomberg denies the allegations contained in paragraph 373 of the Complaint.

374. Bloomberg denies the allegations contained in paragraph 374 of the Complaint.

375. Bloomberg denies the allegations contained in paragraph 375 of the Complaint.

376. Bloomberg denies the allegations contained in paragraph 376 of the Complaint.

377. Bloomberg denies the allegations contained in paragraph 377 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A SIXTEENTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JANET LOURES PURSUANT TO STATE HRL**

378. Bloomberg repeats answers to paragraphs “1” through “377” with the same force and effect as if set forth at length herein.

379. Bloomberg denies the allegations contained in paragraph 379 of the Complaint.

380. Bloomberg denies the allegations contained in paragraph 380 of the Complaint.

381. Bloomberg denies the allegations contained in paragraph 381 of the Complaint.

382. Bloomberg denies the allegations contained in paragraph 382 of the Complaint.

383. Bloomberg denies the allegations contained in paragraph 383 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
A SEVENTEENTH CAUSE OF ACTION FOR GENDER  
DISCRIMINATION ON BEHALF OF JANET LOURES PURSUANT TO CITY HRL**

384. Bloomberg repeats answers to paragraphs “1” through “383” with the same force and effect as if set forth at length herein.

385. Bloomberg denies the allegations contained in paragraph 385 of the Complaint.

386. Bloomberg denies the allegations contained in paragraph 386 of the Complaint.

387. Bloomberg denies the allegations contained in paragraph 387 of the Complaint.

388. Bloomberg denies the allegations contained in paragraph 388 of the Complaint.

389. Bloomberg denies the allegations contained in paragraph 389 of the Complaint.

390. Bloomberg denies the allegations contained in paragraph 390 of the Complaint.

391. Bloomberg denies the allegations contained in paragraph 391 of the Complaint.

**AS TO ALLEGATIONS CONCERNING  
AN EIGHTEENTH CAUSE OF ACTION FOR RETALIATION  
ON BEHALF OF JANET LOURES PURSUANT TO CITY HRL**

392. Bloomberg repeats answers to paragraphs “1” through “391” with the same force and effect as if set forth at length herein.

393. Bloomberg denies the allegations contained in paragraph 393 of the Complaint.

394. Bloomberg denies the allegations contained in paragraph 394 of the Complaint.

395. Bloomberg denies the allegations contained in paragraph 395 of the Complaint.

396. Bloomberg denies the allegations contained in paragraph 396 of the Complaint.

397. Bloomberg denies the allegations contained in paragraph 397 of the Complaint.

398. Bloomberg denies the allegations contained in paragraph 398 of the Complaint.

**AFFIRMATIVE DEFENSES**

1. The Complaint fails to state a claim upon which relief can be granted.
2. The Complaint fails to state a claim upon which an award of punitive damages may be granted.
3. Plaintiff-Intervenors' claims are barred in whole or in part by applicable statutes of limitation.
4. Plaintiff-Intervenors' claims are barred in whole or in part by the doctrine of unclean hands.
5. Bloomberg's employment decisions with respect to Plaintiff-Intervenors were not motivated in whole or in part by gender or status as a pregnant person.
6. Bloomberg's employment decisions with respect to Plaintiff-Intervenors were not motivated in whole or in part as a retaliation for engaging in a protected activity.

WHEREFORE, Bloomberg demands judgment dismissing the Complaint with prejudice and granting to Bloomberg its costs and expenses of this action, including reasonable attorneys' fees and other such and further relief as this Court may deem just and appropriate.

Dated: New York, New York  
December 24, 2007

WILLKIE FARR & GALLAGHER LLP

By:                     /s/                      
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